

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
Squirrels Research Labs LLC, <i>et al.</i> <sup>1</sup>	)	Case No. 21- 61491
	)	
Debtors.	)	<i>(Jointly Administered)</i>
	)	
	)	Judge Tiiara N.A. Patton
	)	

**SECOND REPLY IN SUPPORT OF MOTION OF SQUIRRELS RESEARCH LABS LLC  
AND THE MIDWEST DATA COMPANY LLC FOR ENTRY OF AN ORDER  
APPROVING COMPROMISE AND SETTLEMENT WITH CINCINNATI INSURANCE  
COMPANY**

Squirrels Research Labs LLC (“SQRL”) and The Midwest Data Company LLC (“MWDC”, collectively with SQRL, the “Debtors”), by and through undersigned counsel, hereby submit this second reply in support of the motion (the “Motion to Compromise”) for the entry of an order, pursuant to Section 105 of Title 11 of the United States Bankruptcy Code (“Bankruptcy Code”) and Rule 9019 of the Federal Rules of Bankruptcy Procedure, to approve the settlement of a controversy (the “Compromise”) between Debtors and Cincinnati Insurance Company. In support of the Motion to Compromise and in opposition to the Objection of Paul Billinger (“Billinger”) to the Settlement Agreement and Mutual Release Filed by Debtor Squirrels Research Labs, LLC (the “Objection”), Debtors respectfully state the following:

1. The late-filed Objection primarily raises the same two categories of complaint with respect to the settlement as the objection filed by SF Mining. For the reasons set forth in the

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<sup>1</sup> The “Debtors” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

Debtors' first reply in support of the Motion to Compromise [Docket #329], which the Debtors incorporate herein, the Court should overrule the Objection.

2. In addition, Billinger's Objection should be overruled because it was filed late and Billinger lacks standing to raise these concerns as he is not a creditor of the entity who requires Court approval to enter into the Compromise, to wit, SQRL.

3. SQRL's bankruptcy case was jointly administered for procedural purposes with the bankruptcy case of The Midwest Data Company LLC under Case No. 21-61491 pursuant to a prior order of this Court entered on December 1, 2021.

4. Deadlines for filing proofs of claim were set and passed in both cases. Paul Billinger is not a creditor scheduled in either case. Paul Billinger did not file a proof of claim in either case.

5. Upon information and belief, Paul Billinger is a representative of Torea Consulting, Ltd. ("Torea Consulting"), an entity listed on SQRL's schedules with a contingent, unliquidated, disputed claim, and who filed a proof of claim against SQRL. David Neumann of Myers, Roman, Friedberg & Lewis has represented Torea Consulting in these jointly administered cases and has, on behalf of their client, participated in these bankruptcy cases, including by taking the 2004 examination of Debtors' representative, David Stanfill.

6. Torea Consulting did not file an objection to the Motion to Compromise.

7. For all of the reasons set forth in the Motion to Compromise and in the first reply in support of the Motion to Compromise, the Debtors believe the Compromise is fair, reasonable, and in the best interest of the estate, and falls well within the range of reasonableness that should be approved by the Court.

WHEREFORE, SQRL respectfully requests this Court overrule the Objection, grant the Motion to Compromise, and grant such other and further relief as the Court deems appropriate.

Dated: May 15, 2024

Respectfully submitted,

/s/ Julie K. Zurn

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## CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2024, a true and correct copy of the **SECOND REPLY IN SUPPORT OF MOTION OF SQUIRRELS RESEARCH LABS LLC AND THE MIDWEST DATA COMPANY LLC FOR ENTRY OF AN ORDER APPROVING COMPROMISE AND SETTLEMENT WITH CINCINNATI INSURANCE COMPANY** was served via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

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